

**PROPOSED DISCOVERY PLAN/SCHEDULING ORDER**

	DONE	NOT APPLICABLE	DATE
<b>A. ACTIONS REQUIRED <u>BEFORE</u> THE INITIAL CONFERENCE</b>			
1. Rule 26(f) Conference held	✓		
2. Rule 26(a)(1) disclosures exchanged			09/30/2021
3. Requested:			
a. Medical records authorization		N/A	
b. CPL § 160.50 releases for arrest records		N/A	
c. Identification of John Doe/Jane Doe defendants		N/A	
4. Procedures for producing Electronically Stored Information (ESI) discussed	✓		
5. Protective Order to be submitted for court approval (see Standing Protective Order on the Chambers website)			
<b>B. SETTLEMENT PLAN</b>			
1. Plaintiff to make settlement demand			10/5/2021
2. Defendant to make settlement offer			10/19/2021
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date for mediation to be completed)			
4. Settlement Conference (proposed date)			
<b>C. PROPOSED DEADLINES</b>			
1. Motion to join new parties			10/28/2021
2. Motion to amend pleadings			10/28/2021
3. Initial documents requests and interrogatories			10/28/2021
4. All fact discovery to be completed (including disclosure of medical records)			6/8/2022
5. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			6/15/2022

6. Expert discovery (only if needed)		Check here if not applicable <input type="checkbox"/>	
Plaintiff expert proposed field(s) of expertise:	Credit Reporting		
Defendant expert proposed field(s) of expertise:	Credit Reporting		
	<b>DONE</b>	<b>NOT APPLICABLE</b>	<b>DATE</b>
a. Affirmative expert reports due			3/25/2022
b. Rebuttal expert reports due			5/9/2022
c. Depositions of experts to be completed			6/8/2022
7. Completion of ALL DISCOVERY (if different from C.4)			6/8/2022
8. Joint status report certifying close of ALL DISCOVERY and indicating whether dispositive motion is anticipated			6/15/2022
9. If any party seeks a <b>dispositive motion</b> , date to a. file request for pre-motion conference (if required), or b. file briefing schedule for the motion			a-7/23/2022 b-7/30/2022
10. Proposed Joint Pre-Trial Order due (if no dispositive motion filed)			7/30/22
<b>D. CONSENT TO MAGISTRATE JUDGE JURISDICTION</b>			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motions?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. All parties consent to Magistrate Judge jurisdiction for trial?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY</b>			
1. Motion for collective action certification in FLSA cases		N/A	
a. Response due			
b. Reply due			
2. Motion for Rule 23 class certification		N/A	
a. Response due			
b. Reply due			

**This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.**

SO ORDERED:

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**MARCIA M. HENRY**  
United States Magistrate Judge

\_\_\_\_\_  
**Date**